

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, rm 1061
Rockville, MD 20852

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RE: Docket No. 00D-1598

Dear FDA,

I am writing regarding the "*Draft Guidance for Industry: Voluntary Labeling Indicating Whether Foods Have or Have Not Been Developed Using Bioengineering.*" Despite the fact that you received more than 50,000 comments last year on genetically engineered foods, most of which supported mandatory labeling, you are still not in support of this labeling. Genetically engineered foods are required to be labeled in the E.U. nations, in Japan, Australia, New Zealand and other countries.

Studies have shown that biotech soybeans contain altered levels of nutrients such as isoflavones. They have been shown to have higher levels of Kunitz trypsin inhibitor, a known antinutrient and allergen. Genetically engineered foods contain antibiotic marker genes and many contain built-in pesticides. These are not found in non-genetically engineered foods.

Last year, Monsanto admitted to finding "unexpected gene fragments" in their genetically engineered soybeans. What other "unexpected gene fragments" are contained in other genetically engineered foods? The truth is that the FDA does not know, because these experimental foods have not been adequately tested. New proteins never before consumed by humans are being created and brought to market without any extensive tests being done to show that they are not causing allergies, cancer or other diseases.

In the case of genetically engineered foods, the FDA has done a poor job of protecting the safety of consumers. The potential allergies created by the ingestion of StarLink corn completely escaped the FDA regulatory guidelines. Instead, the EPA discovered the digestive problems associated with this corn.

In your Draft Guidance you question whether manufacturers who choose not to use genetically engineered ingredients should be able to label their products as GMO Free. Your agency even seems to be exploring the idea of restricting the ability of a manufacturer to let consumers know the products are not genetically engineered.

I urge you to change your current position, and take steps to ensure mandatory labeling of genetically engineered foods.

Sincerely,

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